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VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *Authors Guild et al. v. OpenAI, Inc., et al., and Alter et al. v. OpenAI Inc., et al., Nos. 1:23-cv-08292-SHS & 1:23-cv-10211-SHS*

Dear Judge Wang:

Pursuant to Rule IV.a. of Your Honor's Individual Practices, we submit this joint letter-motion to seal on behalf of the Author Plaintiffs and the OpenAI Defendants ("OpenAI") in the above-captioned matter in connection with documents referenced in OpenAI's contemporaneously filed Opposition to Plaintiffs' Motion to Compel.

The redactions in OpenAI's opposition describe documents that OpenAI produced in discovery and designated confidential or highly confidential under the operative Protective Order in this case (ECF No. 148).

Plaintiffs' Position on Sealing. Plaintiffs take no position on whether the redacted material should remain under seal.

OpenAI's Position on Sealing. For the same reasons stated in the parties' October 24, 2024 Joint Letter-Motion to Seal Plaintiffs' Motion to Compel and Related Exhibits (Dkt. No. 233) and articulated in more detail in the Declaration of Michael Trinh filed in support thereof (Dkt. No. 233-1), OpenAI respectfully requests the Court grant this motion for leave to file its letter brief in opposition to Plaintiffs' motion under seal. Limited portions of the opposition reference or summarize the same confidential materials that are currently subject to the October 24, 2024 Motion to Seal (Dkt. No. 233), including exhibits designated as confidential under the operative Protective Order.

Accordingly, in order to maintain the confidential nature of this information, OpenAI respectfully requests the Court grant this motion to seal.

Sincerely,

MORRISON & FOERSTER LLP
/s/ John Lanham
John Lanham

KEKER, VAN NEST & PETERS LLP
/s/ Michelle Ybarra
Michelle Ybarra

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/s/ Elana Nightingale Dawson

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/s/ Rohit Nath

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/s/ Rachel Geman

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